

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI NORTHERN DIVISION

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 3:22CR 123.TSL-FKB

JESSICA HILL and NICOLE MOORE 18 U.S.C. § 242

The Grand Jury charges:

At all times relevant to this indictment: (1) the Mississippi Department of Corrections ("MDOC") staffed the Central Mississippi Correctional Facility ("CMCF"), located in Pearl, Mississippi. (2) Defendant, **JESSICA HILL** was working as a correctional officer at CMCF, employed by MDOC. (3) Defendant, **NICOLE MOORE**, was working as a case manager at CMCF, employed by MDOC. (4) L.C. was an inmate at CMCF.

On or about July 11, 2019, in Rankin County, in the Northern Division of the Southern District of Mississippi, defendants, **JESSICA HILL and NICOLE MOORE**, while acting under color of law, and aided and abetted by each other and others known and unknown to the grand jury, willfully deprived inmate L.C. of the right, secured and protected by the Constitution and the laws of the United States, to be free from cruel and unusual punishment. Specifically, while L.C. was not resisting, **JESSICA HILL** struck L.C. with an Oleoresin Capsicum cannister and punched L.C., and **NICOLE MOORE** kicked L.C. The offense resulted in bodily injury to L.C., and involved the use of a

dangerous weapon, to wit: **JESSICA HILL's** use of an Oleoresin Capsicum cannister, and **NICOLE MOORE's** use of a shod foot.

All in violation of Title 18, United States Code, Sections 242 and 2.

DARREN JALAMARCA

United States Attorney

A TRUE BILL: S/SIGNATURE REDACTED Foreperson of the Grand Jury

UNITED STATES MAGISTRATE JUDGE